

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT COURT OF TENNESSEE**

**IN RE:** )  
**THOMAS WILLIAM PRIGNANO** )  
**TOMME NOELLE PRIGNANO** )  
**7201 CHARLOTTE PK. #101** )  
**NASHVILLE, TN 37209** )  
**SSN: XXX-XX-9751/9207** )  
**Debtors.** )  
CASE NO: 20-01115-RSM-13  
CHAPTER 13  
JUDGE MASHBURN

**DEBTORS' RESPONSE TO MOTION FOR RELIEF FROM AUTOMATIC STAY**

COMES NOW the debtors, by and through counsel, and for his response to the Motion for Relief, would respectfully state unto this Court as follows:

1. Debtors' 2013 Volkswagen Jetta is essential for an effective reorganization of their Plan under 11 U.S.C. §362(d)(2)(B), as each Debtor needs his or her vehicle to get to and from their place of employment in order to fund the plan.
2. VW Credit did not receive its scheduled payment at the end of June nor at the end of July.
3. The reason for the non-payment is that Debtors were granted a suspension on June 26<sup>th</sup>, 2020 (Doc. 40). VW Credit had the requisite twenty-one (21) day period to object to the Motion (Doc. 37) filed on June 2<sup>nd</sup>, but did not do so.
4. VW Credit, Inc. has received all payments required after the suspension concluded, and will be paid the amount listed in the Confirmation Order (Doc. 26).
5. Debtors request Motion to be denied.

Respectfully submitted this the 2<sup>nd</sup> day of December, 2020

/s/ Ryan Lloyd  
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**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that on this the 2<sup>nd</sup> day of December, 2020, true and correct copies of the foregoing have been served in the following manner:

***Email by Electronic Case Noticing to:***

Beth R. Derrick, Assistant U.S. Trustee  
Henry E. Hildebrand, III, Chapter 13 Trustee

***By U.S. Postal Service, postage prepaid to:***

The Debtor(s) at the above address  
Spina & Lavelle, PC, One Perimeter Park South, Suite 400N, Birmingham, AL 35243  
Volkswagen Credit, PO Box 3, Hillboro, OR 97123

***By Certified Mail to:***

***Total Mailings by U.S. Postal Service: 3***

/s/ Ryan Lloyd  
RYAN LLOYD #034323